

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

*Defendants.*

Civil Action No. 2:24-cv-00627-JRG-RSP

**JURY DEMANDED**

**JOINT MOTION FOR EXTENSION OF TIME TO  
COMPLY WITH P.R. 3-1, 3-2, 3-3, AND 3-4**

Plaintiff Headwater Research, LLC (“Headwater”) and Defendants Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (collectively, “Defendants” or “Samsung”), (collectively, the “Parties”) file this Joint Motion for Extension of Time to Comply with P.R. 3-1, 3-2, 3-3, and 3-4.

The current deadline for the Plaintiff to comply with P.R. 3-1 and 3-2 is October 24, 2024. *See* D.I. 24. The current deadline for the Defendants to comply with P.R. 3-3 and 3-4 is December 19, 2024. *See* D.I. 24. The Parties have been diligently preparing these materials and respectfully request a brief extension of time to finalize these materials. This extension is not sought for prejudice or delay, but for good cause and so that justice may be served.

Accordingly, the Parties respectfully request that the Court extend the deadline to comply with P.R. 3-1 and 3-2 to November 7, 2024, and extend the deadline to comply with P.R. 3-3 and 3-4 to January 16, 2024.

Dated: October 24, 2024

Respectfully submitted,

/s/ Jason Wietholter

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**ATTORNEYS FOR PLAINTIFF,  
Headwater Research LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 24<sup>th</sup> day of October 2024, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Jason Wietholter

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Jason Wietholter